## NOT TO BE PUBLISHED IN THE OFFICIAL REPORTS

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# IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA SECOND APPELLATE DISTRICT DIVISION FOUR

DENNIS P. BLOCK et al.,

Plaintiffs, Respondents, and Cross-Appellants

v.

DANIEL BRAMZON et al.,

Defendants, Appellants, and Cross-Respondents.

DENNIS P. BLOCK et al.,

Plaintiffs and Respondents,

v.

BRETT SCHULTE,

Defendant and Appellant.

B292129

(Los Angeles County Super. Ct. No. EC067254)

B297198

(Los Angeles County Super. Ct. No. EC067254)

APPEAL from orders of the Superior Court of Los Angeles County, Ralph C. Hofer, Judge. Reversed in part and remanded with directions.

Roshanian Law Firm, Neda Roshanian and Patrick J. D'Arcy for Plaintiffs, Respondents, and Cross-Appellants.

Law Office of Benjamin G. Ramm, Benjamin G. Ramm for Defendant, Appellant, and Cross-Respondent Brett Schulte.

BASTA, Inc., Eric Post for Defendants, Appellants, and Cross-Respondents Daniel Bramzon and BASTA, Inc.

## INTRODUCTION

Plaintiffs and respondents Dennis P. Block (d.b.a. Dennis P. Block and Associates), Paul Eric Gold, Hasti Rahsepar, and Azam Riesen sued defendants and appellants BASTA, Inc., Daniel Bramzon, and Brett Schulte for libel and other related claims. In response, BASTA and Bramzon filed a special motion to strike under Code of Civil Procedure section 425.16, the anti-SLAPP statute.<sup>1</sup>

The trial court found the allegations in the complaint arose from protected activity under section 425.16, subdivision (e)(3) and (4) and granted BASTA's and Bramzon's motion in part by striking two causes of action. After plaintiffs voluntarily dismissed those two claims against him, Schulte filed his own special motion to strike the remaining claims. The court denied Schulte's motion in its entirety, concluding plaintiffs showed a probability of prevailing against him.

BASTA and Bramzon appeal the order on their anti-SLAPP motion to the extent it denied the motion, and Schulte separately appeals from the order denying his motion. Plaintiffs crossappeal, contending the trial court erred in ruling the statements at issue constitute protected activity. On our own motion, we consolidated the appeals for purposes of oral argument and decision.

We conclude defendants' alleged speech and conduct do not involve a public issue or an issue of public interest. (§ 425.16, subd. (e)(3), (4).) Accordingly, we reverse the portion of the order granting BASTA's and Bramzon's motion to strike the fifth and sixth causes of action, and the grant of attorneys' fees and costs to BASTA and Bramzon as partially prevailing parties. In all other respects, we affirm.

<sup>1</sup> SLAPP is the acronym for strategic lawsuit against public participation. All further undesignated statutory references are to the Code of Civil Procedure.

## FACTUAL AND PROCEDURAL BACKGROUND

## A. The Complaint's Allegations

Plaintiffs' operative complaint, filed in 2018, alleged the following facts. Block is "generally regarded as one of the preeminent attorneys handling landlord-tenant matters, and in particular, representing landlords in unlawful detainer matters." Block's "office handles upward of 500 unlawful detainer cases per month." Block's law firm, Dennis P. Block and Associates, "employs not less than 215 employees," including plaintiffs Gold (an associate attorney), Rahsepar (also an associate), and Riesen (the office manager).

BASTA is "a law firm engaged in the business of defending tenants against evictions" and defendant Bramzon is the "founder" of BASTA. "BASTA and Bramzon previously defended Schulte on an unrelated eviction . . . brought by Schulte's former landlord, who was represented by plaintiff Block." Schulte also "worked with and/or [is] an agent of defendant BASTA . . . [and] has his own BASTA e-mail address issued by defendant BASTA."

Defendants "conspired together . . . to collectively embark [on] a malicious and defamatory campaign against Plaintiffs to damage and destroy Plaintiffs, personally and professionally, targeting Block's business, practice and employees . . . ." Specifically, Schulte, in concert with the other defendants, created, administered and maintained a website, dennisblock.com, without Block's permission. "This [] impersonation of Block . . . was knowingly false . . . [and] aimed at creating business disruption, disparagement, annoyance and harassment of Block . . . ." If a potential client went to dennisblock.com, he or she would be redirected "to contact a landlord-tenant law firm other than Block's [o]ffice."

Defendants also created and maintained a Twitter account using the handle @dennispblock and the name "Not Dennis

Block." The author of the Twitter account identifies himself as "Very Stable Genius Not Dennis P. Block." The account was created without Block's permission and was used to tweet allegedly defamatory statements, including statements suggesting (1) Block is a greedy thief and criminal, unethical and immoral, racist, sexist, misogynistic, incompetent, an abuser of drugs, and is unfaithful and promiscuous; (2) Rahsepar is promiscuous, immoral, and is incompetent; and (3) Gold engages in unlawful acts of animal cruelty. The account also posted Block's personal cell phone number, home address, and photos of plaintiffs and some of their family members.

Defendants also engaged in other alleged mischief, including sending Block's law firm "an inordinate amount of email solicitations and telephone calls from on-line and telephone advertisers [] soliciting Plaintiffs to purchase various products . . . , sometimes as many as a thousand or more such solicitations per day . . . ."

Based on these allegations, plaintiffs sued BASTA, Bramzon, and Schulte for invasion of privacy, libel, libel per se, intentional infliction of emotional distress, negligent infliction of emotional distress, intentional interference with prospective economic advantage, and unfair business practices. Plaintiffs

A printout of the Not Dennis Block Twitter feed, which included 351 tweets, was attached to the operative complaint as Exhibit A.

The Twitter account is described as a "Parody account for eviction attorney Dennis P. Block. The tweets use a first-person point of view, as if Block is announcing supposed thoughts he might otherwise keep to himself, such as "I LOVE making fun of the homeless, because, [expletive] them right?"

identified 92 tweets in support of their causes of action for libel and libel per se.<sup>4</sup>

## B. The Special Motions to Strike

BASTA and Bramzon moved to strike the complaint under the anti-SLAPP statute. They contended it was subject to dismissal because Block made himself a public issue and the Not Dennis Block Twitter feed was "intended to serve as a warning to consumers about [Block's] trustworthiness."

In opposition, plaintiffs argued the statements underlying their claims did not concern a public issue or a topic of widespread public interest, and did not contribute to the public debate. And, even if the statements constituted protected activity, plaintiffs argued, they demonstrated a probability of prevailing on their claims.

After finding the complaint arose out of activity protected by the anti-SLAPP statute because the speech and conduct involved "a consumer watchdog type of situation," the trial court struck the negligent infliction of emotional distress and intentional interference with prospective economic advantage causes of action, concluding plaintiffs did not establish a reasonable probability of prevailing on those claims. It held, however, that plaintiffs demonstrated a probability of prevailing on their remaining claims. The court granted BASTA's and Bramzon's motion to recover attorneys' fees for partially prevailing on their special motion to strike.

Plaintiffs voluntarily dismissed the two stricken claims against Schulte. Schulte then filed his own anti-SLAPP motion. The trial court denied the motion, holding plaintiffs showed a probability of prevailing on the remaining claims in the complaint against Schulte.

<sup>4</sup> The 92 tweets are reproduced as Appendix A to this opinion.

#### DISCUSSION

## A. Applicable Law and Standard of Review

SLAPP suits are "generally meritless suits brought by large private interests to deter common citizens from exercising their political or legal rights or to punish them for doing so. [Citation.]" (Wilcox v. Superior Court (1994) 27 Cal.App.4th 809, 816-817, disapproved on another ground in Equilon Enterprises v. Consumer Cause, Inc. (2002) 29 Cal.4th 53, 69.) To combat these types of suits, the Legislature enacted section 425.16—known as the anti-SLAPP statute—to provide a procedural remedy to dispose of lawsuits or individual causes of action that are brought to chill the valid exercise of a person's constitutional rights. (Rusheen v. Cohen (2006) 37 Cal.4th 1048, 1055-1056; see Baral v. Schnitt (2016) 1 Cal.5th 376, 395; § 425.16, subd. (b)(1).)

The anti-SLAPP statute requires a two-step process: first, the moving party must establish that the lawsuit's claims are based on activity protected by the statute. (Briganti v. Chow (2019) 42 Cal.App.5th 504, 508 (Briganti).) If the defendant meets that burden, "the burden shifts to the plaintiff to demonstrate that each challenged claim based on protected activity is legally sufficient and factually substantiated." (Ibid.) "[W]ithout resolving evidentiary conflicts," the court "must determine whether the plaintiff's showing, if accepted by the trier of fact, would be sufficient to sustain a favorable judgment[;] [i]f not, the claim is stricken." (Ibid.) "In making these determinations the court considers 'the pleadings, and supporting and opposing affidavits stating the facts upon which the liability or defense is based.' (§ 425.16, subd. (b)(2).)" (Briganti, supra, 42 Cal.App.5th at p. 508.)

We review the trial court's decision to grant or deny an anti-SLAPP motion de novo. (*Monster Energy Co. v. Schechter* (2019) 7 Cal.5th 781, 788.)

## B. Defendants' Alleged Speech and Conduct Do Not Arise from Protected Activity

Defendants contend the first prong of the anti-SLAPP statute is satisfied because the Not Dennis Block Twitter feed consists of statements made in connection with an issue of public interest. (§ 425.16, subd. (e)(3), (4).) Subdivision (e)(3) protects written statements "made in . . . a public forum in connection with an issue of public interest," and subdivision (e)(4) protects "any other conduct in furtherance of the exercise of the constitutional right of free speech in connection with a public issue or an issue of public interest." Defendants argue Block "has made himself and his firm 'a public issue" and because "the Not Dennis Block Twitter feed is a parody of Block's actual" Twitter feed, the statements on the Twitter account are "about the public issue that Block has made himself."

In FilmOn.com Inc. v. DoubleVerify Inc. (2019) 7 Cal.5th 133 (*FilmOn.com*), our Supreme Court addressed how the context of a statement "should feature" in deciding whether a statement "furthers the exercise of constitutional speech rights in connection with a matter of public interest." (Id. at p. 149.) It held: "The inquiry . . . calls for a two-part analysis rooted in the statute's purpose and internal logic. First, we ask what 'public issue or [] issue of public interest' the speech in question implicates—a question we answer by looking to the content of the speech. [Citation.]" (*Ibid.*) "In articulating what constitutes a matter of public interest," we look to considerations "such as whether the subject of the speech or activity 'was a person or entity in the public eye' or 'could affect large numbers of people beyond the direct participants' [citation]; and whether the activity 'occur[red] in the context of an ongoing controversy, dispute or discussion' [citation], or 'affect[ed] a community in a manner similar to that of a governmental entity' [citation]." (Id. at pp. 145-146.)

Under the second step, courts must "ask what functional relationship exists between the speech and the public conversation about" the "matter of public interest." (FilmOn.com, supra, 7 Cal.5th at pp. 149-150.) This requires consideration of context, including the identity of the speaker, the audience sought, the timing and location of the speech, and the apparent purpose of the conduct to determine whether there is "some degree of closeness" between the speech and the topic of asserted public interest. (Id. at pp. 142-144, 150; see also id. at p. 152 ["the focus of our inquiry must be on 'the specific nature of the speech,' rather than on any 'generalities that might be abstracted from it.' [Citation.]"].) To be protected activity, the speech itself must contribute to the public debate "in some manner." (Id. at p. 150.)

Applying these principles, we conclude the evidence is insufficient to show the statements on the Not Dennis Block Twitter feed were made in connection with a public issue or an issue of public interest.<sup>5</sup>

## 1. The Content of the Statements Did Not Implicate a Public Issue

Defendants contend "Dennis Block has made himself and his firm 'a public issue[,]" and thus anything contained within the Not Dennis Block Twitter account was protected speech. Defendants claim Block conceded he is "a person in the public eye" by alleging he is "generally regarded as one of the preeminent attorneys handling landlord-tenant

<sup>5</sup> Because we conclude defendants have not met their threshold burden of establishing plaintiffs' complaint arose from protected activity, we need not address defendants' argument that, at the second step of the anti-SLAPP analysis, the court erred in not analyzing each of the 93 tweets separately and "limiting the case to only those allegations that could be supported . . . ."

matters . . . representing landlords in unlawful detainer matters" and "gives seminars and regularly writes a column about landlord-tenant matters for the month[ly] publication of Apartment Owners Association." Defendants also cite evidence that Block was profiled on the front page of the Los Angeles Times over ten years ago, and Block continues to display the article on his firm's website.

We are skeptical the evidence in the record satisfies a finding that Block is in the "public eye" for purposes of the anti-SLAPP statute. Block's marketing activities are not all that uncommon among attorneys and do not make him a celebrity. Nor does a single, decade-old newspaper article. In any event, not every statement about a person in the public eye implicates a public issue. (See Albanese v. Menounos (2013) 218 Cal. App. 4th 923, 934 (Menounos) [rejecting the argument "that any statement about a person in the public eye is sufficient to meet the public interest requirement"]; D.C. v. R.R. (2010) 182 Cal.App.4th 1190, 1226 ["[n]o authority supports the . . . broad proposition that anything said or written about a public figure or limited public figure in a public forum involves a public issue"]). Instead, "there should be a degree of closeness between the challenged statements and the asserted public interest. The assertion of a broad and amorphous public interest is not sufficient. Moreover, the focus of the speaker's conduct should be the public interest, not a private controversy.' [Citation.]" (Menounos, supra, 218) Cal.App.4th at p. 936.) Thus, even if defendants could demonstrate Block is a person in the public eye, that fact alone is insufficient to meet the public interest requirement of the anti-SLAPP statute.

Defendants further contend the Not Dennis Block Twitter feed implicates a public issue because: (1) "Block and his firm 'affect large numbers of people beyond the direct participants' in this dispute because 'Block's office handles upwards of 500 unlawful detainer cases per month"; and (2) Block "is a frequent political opponent of tenants [citation], a topic of particular importance during a housing crisis," and "Block's Twitter account . . . proclaims consistent support for President Trump." But again, these arguments focus on Block without tying the content of the tweets at issue in this litigation to a public issue. The requisite "degree of closeness between the challenged statements and the asserted public interest" has not been demonstrated. (See *Menounos*, *supra*, 218 Cal.App.4th at p. 936, citation omitted.)

The public is undeniably interested in critical issues relating to housing, including the shortage of affordable housing, gentrification, rising rents, and rent control. Matthew Desmond's *Evicted: Poverty and Profit in the American City* (2016) won the 2017 Pulitzer Prize for general nonfiction. Eviction can be a pathway to homelessness, and according to pre-pandemic survey results released by the Public Policy Institute of California, Californians were most likely to name homelessness as the most important issue for the Governor and Legislature to address in 2020. (https://www.ppic.org/publication/ppic-statewide-survey-californians-and-their-government-january-2020.) But the tweets forming the basis for plaintiffs' suit discuss none of these things. As discussed further below, even the unchallenged tweets do not discuss these issues in any way that might meaningfully contribute to the marketplace of ideas.

Examples of the tweets include: "If you have tenants from countries that dear leader Trump has designated as 'shithole countries' we can help you evict them today!"; "Olympics = more law enforcement, infrastructure, jobs, and raise property values and tax revenues. The poor don't contribute, get them out!"; "Dennis Block & Associates is helping to #MAGA [Make America Great Again] by evicting one latino at a time!"; "Excited to see Los Angeles making evictions harder, and me more money!"; and "Don't miss my Alt-Right landlord rally on March 14, 2017 at 11 AM in the Pasadena Convention Center. #MAGA #TRUMP."

These statements are too tangentially related to public issues to qualify as protected speech. (See *FilmOn.com*, *supra*, 7

Cal.5th at p. 152 ["the focus of our inquiry must be on 'the specific nature of the speech,' rather than on any 'generalities that might be abstracted from it.' [Citation.] Defendants cannot merely offer a 'synecdoche theory' of public interest, defining their narrow dispute by its slight reference to the broader public issue. [Citation.]"].)

Finally, defendants argue the Not Dennis Block Twitter feed is protected activity because it is "intended to serve as a warning to consumers about [Block's] trustworthiness." We disagree. Assuming Block's "trustworthiness" is an issue of public interest, once again, it is too tangentially related to the specific content of the allegedly libelous statements here. A majority of the statements consist of vulgar and/or adolescent personal insults, misogynistic, racist, and xenophobic comments, and other slurs having nothing to do with any reasoned discussion of trustworthiness, competence, or any other "public issue or an issue of public interest." (§ 425.16, subd. (e)(4).) Examples include the following: "My associate 'Nasty Hasti' Rahsepar continues to sexually harass our entire office with her age inappropriate outfits. That's what I get for recruiting at Hooters."; "My associate Nasty Hasti really needs to start wearing longer skirts to court. Or underwear. Or at least trim."; "My associates are all either obese, disciplined by the bar, or cheap 'people of color' working against their own kind. Oh, or my idiot sons."; "Did you hear Hasti won a jury trial today? Apparently the jury was stunned that a woman her age dresses like a teenager in court."; "It's so weird when Tinder matches you to one of your employees ... but OK Hasti your move."; "A client called to complain that our Manisha Bajaj was 'dressing like a prostitute'. I told him wait until he sees 'Nasti Hasti' Rahsepar!'; "I can't confirm that my son Ryan is dating attorney 'Nasty Hasti Rahsepar,' though I do enjoy watching the cameras when they 'work' late."; "When people ask what it takes to be a Dennis Block attorney I tell them a 'complete lack of morals and a disdain for customer service.";

"Our new mail order associate Shireen Mashkati. No one can exploit immigrants like I can . . . she even cleans our vacation house on weekends!"; "I really shouldn't smoke weed at lunch. I am so STONED. I love tenants. No, wait, get a hold of yourself Dennis."

Although information in the "nature of consumer protection information," such as a "warning" not to use a person's services, are matters of public interest (see, e.g., *Carver v. Bonds* (2005) 135 Cal.App.4th 328, 343-344), the statements at issue here plainly were not provided to assist consumers choosing among law firms. To hold otherwise would turn every insult of a businessperson into a "consumer protection" matter subject to anti-SLAPP protection. We do not believe the Legislature intended that result.

## 2. The Statements Did Not Contribute to Public Debate

Even if defendants had identified a public issue implicated by their statements, we would not be persuaded that their statements, in context, contributed to the public debate on the issues they purportedly implicate. (FilmOn.com, supra, 7 Cal.5th at p. 150 ["it is not enough that the statement refer to a subject of widespread public interest; the statement must in some manner itself contribute to the public debate.' [Citations.]"].) Defendants urge us to review the entire Twitter feed — not just the 92 tweets underlying plaintiffs' causes of action — for context. But context reveals the tweets are undeserving of protection under the statute.

BASTA and Block are on opposing sides of the unlawful detainer bar – Block represents landlords and BASTA represents tenants in eviction cases. The complaint alleges BASTA, Bramzon, and Schulte conspired together and participated in creating the tweets at issue. Thus, it appears the purpose of the

Not Dennis Block Twitter feed was not to contribute to a public debate on policy related to the housing crisis or to provide meaningful consumer protection information, but to slam Block – BASTA's frequent adversary and someone Schulte plainly dislikes.

Indeed, in support of their argument that the Twitter account is a parody (and thus, they contend, nonactionable), defendants claim "only an unreasonably gullible person might believe that Block actually made any of the statements that appear in the Not Dennis Block Twitter feed because those statements are too ludicrous to be true or too critical to have been made by Block." They further state, in support of their argument the statements on the Twitter feed are not defamatory, that the "bulk of the account is just anonymous internet trash talk, i.e., not to be taken literally." "[A]nonymous internet trash talk" does not warrant anti-SLAPP protection, however. It does not contribute to a public debate on Block's "trustworthiness," the housing crisis, or any other plausible public issue.

Moreover, we reject defendants' argument that occasionally republishing negative reviews of Block's law firm on the Twitter account transforms them into consumer watchdogs. Sprinkling in some negative Yelp reviews cannot insulate unrelated actionable statements. This is not the purpose of the anti-SLAPP statute. (Digerati Holdings, LLC v. Young Money Entertainment, LLC (2011) 194 Cal.App.4th 873, 883 ["The purpose of the anti-SLAPP statute is to encourage participation in matters of public significance and prevent meritless litigation designed to chill the exercise of First Amendment rights. (§ 425.16, subd. (a).)"].)

We also reject defendants' contention that the alleged "noncommunicative" acts (i.e., redirecting visitors to dennisblock.com to a website of another law firm, or making Block's firm the recipient of robocalls and spam) constitute "other conduct in furtherance of the exercise of the constitutional right . . . of free speech in connection with a public issue or an issue of

public interest." (§ 425.16, subd. (e)(4).) Nothing about these alleged acts furthered defendants' right of free speech in connection with a public issue or matter of public interest.

## C. A Note on Civility

Having resolved the merits of this consolidated appeal, we would be remiss if we did not comment on the topic of civility. The case raises the issue whether the alleged participation of Bramzon (and/or other attorneys employed by or acting on behalf of BASTA) in the challenged tweets and other alleged conduct constitutes professional incivility, including expressions of gender bias and misogyny. Pursuant to Government Code section 68081, we asked the parties to file short supplemental briefs addressing whether the tweets and alleged conduct (if proven) would violate any State Bar disciplinary rule or rules and whether this court or the superior court has authority to take remedial action or impose sanctions. (See *Briganti*, supra 42 Cal.App.5th at pp. 510-512.) In their response, Bramzon, BASTA, and Schulte concede "[t]he Not Dennis Block Twitter feed is a string of incivility directed at [Block and his employees]," but question whether it warrants professional discipline. We believe the answer depends at least in part on the facts, including the nature and extent of Bramzon's and/or other BASTA lawyers' participation in, or encouragement of, Schulte's tweets and attempts to disrupt Block's practice. Because the facts are almost wholly undetermined at this early stage of the proceedings, we are unable to resolve the issue, and leave it to the superior court on remand to make such inquiries, orders, and/or referrals to the State Bar as it deems appropriate.

## **DISPOSITION**

The portion of the August 10, 2018 order granting BASTA's and Bramzon's motion to strike the fifth and sixth causes of action is reversed. On remand, the court is directed to deny the motion to strike in its entirety. The February 15, 2019 order granting attorneys' fees to BASTA and Bramzon is also reversed. In all other respects, the orders are affirmed. Plaintiffs are awarded their costs on appeal.

## NOT TO BE PUBLISHED IN THE OFFICIAL REPORTS

CURREY, J.	
We concur:	
MANELLA, P.J.	
COLLINS, J.	

## APPENDIX A

- 1. "Oh @housingrightsLA I'm 'of interest' to your members...
  as I evict every single one of them! #evict123 #MAGA
  #TRUMP"
- 2. "Everytime [sic] I get whiney annoying landlords complaining blah blah I just say 'Go tell someone who cares... on Yelp' and I just dream of Maui."
- 3. "I really shouldn't smoke weed at lunch. I am so STONED. I love tenants. No wait, get a hold of yourself Dennis."
- 4. "Our Dennis Block & [sic] Associates attorney of the day is 'Nasty' Hasti Rahsepar! Check out her reviews on our Yelp!"
- 5. "Meet our staff! Hasti Rahsepar! She makes Ida Jealous! facebook.com/hasti.rahsepar"
  - a. A blurred photo is attached to this tweet.
- 6. "Landlord? Start a @dennisblock eviction today at dennisblock.com. My Blockheads are standing by!"
  - a. This tweet links to the Dennis Block Yelp page.
- 7. "When Larry Shepard says Dennis Block [sic] 'office staff is horrendous' he means Amy Riesen. Everyone seems to hate Amy. google.com/maps/reviews/d...."
  - a. A blurred photo is attached. The photo is labeled "Amy and Amy Riesen [sic]."
- 8. "He actually told me to go [expletive] myself!'- Dennis Block & Associates review on Yelp [¶] allen c.'s [sic] review of Dennis P Block and Associates [¶] I will report Dennis block [sic] to the State Bar. He neglected to subpoena a key witness in my case and I had to settle without getting attorney fees. His attitude .... Yelp.com"
- 9. "Wondering who hung up on you when you called Dennis Block & Associates? Probably our office manager, the 'queen of mean' Amy Riesen!"
  - a. A blurred photo is attached to this tweet.
- 10. "How can I subtly tell my office manager @amyriesen to lay off the plastic surgery? We all try hard not to stare, but it's hard."

- 11. "If you're fed up with our office hanging up on your calls or over charging you check out @fast\_evictions. People seem to like them better!"
- 12. "Exciting to see Los Angeles making evictions harder, and me more money! [¶] L.A. City Council takes first step to make evictions... Los Angeles is looking to give many renters stronger protections against eviction, amid a [sic] affordability housing shortage. [¶] latimes.com"
- 13. "When people ask what it takes to be a Dennis Block attorney I tell them 'a complete lack or [sic] morals and a disdain for customer service."
- 14. "Olympics = [sic] more law enforcement, infrastructure, jobs, and raise [sic] property values and tax revenues. The poor don't contribute, get them out! [¶] NOlympics LA @NOlympicsLA [¶] This is a stellar piece on the very present dangers of an LA bid that @LA2028 won't even acknowledge. Read this now. [¶] washingtonpost.com/news/made-by-h...."
- 15. "No, I was amoral way before that! Check out @dennispblock to learn more! [¶] **bwphtogr4** @bwphtogr4 [¶] Replying to @romanrimlich @DennisBlock [¶] So when someone stops paying for something they are using that belongs to someone else and @Dennisblock puts a stop to it, he is amoral?"
- 16. "#justcause sounds like more money for Dennis Block & Associates.. bring it on! [¶] **Kenton Card** @kenton\_card [¶] Replying to @kenton\_card @gilcedillocd1 @khouriandrew [¶] "Nice 2see @gilcedillocd1 demanding @HCIDLA provide recommendations 4 expanding #justcause in Los Angeles w/ @LATenantsUnion @ednlosangeles"
- 17. "When a Dennis Block attorney wins their first jury trial they get a Rolex. But on their first tenant suicide, they get a new car!"
- 18. "This weekend is my birthday. The 6th month of the year...
  I'll be 66. 666 is my favorite number!"
- 19. "But rent control is great for ME. When the landlord loses, Dennis Block wins. We count on landlords being too dumb to understand that! [¶] **bwphtogr4** @bwphtogr4

- [¶]Replying to @DennisBlock [¶] Until we get hit with rent controls because we're such greedy [expletive]. Just as when gas price [sic] goes up, we hear rumblings of price controls."
- 20. "John C. Feely of @evictionca on the economics of eviction...the only winners are attorneys like @dennisblock. evictionlaw.org/blog/2017/Arpi... [sic]"
- 21. "When we lose an eviction case, and we do lose, the total costs to the landlord can be \$40k and up. We don't usually mention that up front."
- 22. "More evictions, more money... be it Basta, EDN, Inner City, Public Counsel. We get paid win, lose, or draw. Twitter.com/evictions/sta [sic]... [¶] This Tweet is unavailable."
- 23. "I love these new tenant protection laws, unhappy landlords mean more money for me! City council proposes new anti-harassment bills to protect tenants fr [sic] ... The bills aim to give tenants more leverage when it comes to battling aggressive and intimidating landlords. [¶] ny.curbed.com"
- 24. "On our website we list numbers in other cities pretending we have offices there. Our clients are that dumb and we're that dishonest."
- 25. "By hiring lawyers with baggage and low self[-]esteem I save a fortune, and let's face it, who else would WANT be an eviction attorney??"
- 26. "In recruiting attorneys I look for those with a history of abusing children or animals because I know they'll have the stomach for our work."
- 27. "Trump and I have same diagnosis 'Malignant narcissism characterized by grandiosity, sadism and antisocial behavior.' [¶] **Opinion** | **Is It Time to Call Trump Mentally Ill?** [¶] When psychiatrists give diagnoses about the mental health of politicians, it's not just unethical- it's intellectually suspect. [¶] nytimes.com"
- 28. "I LOVE making fun of the homeless, because, [expletive] them right? [¶] twitter.com/DennisBlock/st... [¶] This Tweet is unavailable."

- 29. "Want a job where you can serve the community and make the world a better place? Nah come work with us instead! [¶] Eviction Attorney | Career [¶] Eviction Attorney Specializing in Tenant Eviction, Free Landlord Forms, Landlord Tenant Law and Legal Issues, Free 3 Day Notice To Pay [¶] evict123.com."
- 30. "If you have tenants from the countries that dear leader Trump has designated as 'shithole countries' we can help you evict them today!"
- 31. "Finally some good news! This is what we are fighting for! [¶] Los Angeles is quickly becoming a place exclusively for the white an [sic]... [¶] LA's Black population has declined by 100,000 since the 1980s, falling from 13% of the County population to 8% in just a few decades... [¶] knock-la.com"
- 32. "Thinking of opening a Dennis Block office in Houston to help get rid of all the freeloaders! [¶] We don't have anything': landlords demand rent on flooded Houston... Displaced families say they are struggling to pay rent on damaged dwellings, as an acute housing crisis grips south-east Texas after Hurricane Harvey. [¶] theguardian.com"
- 33. "Proud to be doing our part to 'Make America Great ("white") Again!' [¶] InnerCityLawCenter @innercitylaw [¶] Latino #homelessness in LA up by 63%. ow.ly.ubSg30cPGZA"
- 34. "Dennis Block &Associates is helping to #MAGA by evicting one latino [sic] at a time!" [¶] Laura Ingraham @IngrahamAngle [¶] Surge in Latino homeless population in Los Angeles- significant percentage illegals. latimes.com/local/californ [sic] ..."
- 35. "Our new mail order associate Shireem Meshkarti. No one can exploit immigrants like I can... she even cleans our vacation house on weekends!"
  - a. A blurry photo is attached. The photo appears to depict three individuals behind a table with the words "Dennis Block & Associates" on the wall behind them.

- 36. "Don't miss my Alt-Right landlord rally on March 14, 2017 at 11 AM in the Pasadena Convention Center. #MAGA #TRUMP."
- 37. "People say I'm a racist, and while that may be true, I employ many under paid minorities like Hispanic [sic] Daniel Costas! #DayWithoutImmigrants."
- 38. "I too am a very stable genius."
- 39. "I'm just like President Trump, the people around me complain about my deteriorating mental capacity too."
- 40. "When I'm dry, I know I'm protected' [¶] **Depends**® | **Adult Incontinence Products, Undergar** [sic] ... [¶] Find confidence & comfort with Depend® underwear & bladder leakage products. Try a free sample or coupon to discover your perfect size. [¶] depend.com"
- 41. "I got lost on my way to the bathroom today."
- 42. "Glad someone in my office can win a case. My idiot sons are such a disappointment. Donald understands my pain right Mr. President? [¶] twitter.com/dennisblock/st... [¶] This Tweet is unavailable."
- 43. "Want to hear an irrelevant angry old man rant? No, not Trump... me! [¶] Free Seminar by Attorney Dennis Block Sept. 28, 2017 [¶] 'Rent Control is Spreading-Protect Yourself Now & Getting Qualified Tenants' Sept. 28, 2017 at the Long Beach Convention Center Seminar [¶] evict123.com."
- 44. "My associates are either obese, disciplined by the bar, or cheap 'people of color' working against their own kind. Oh, or my idiot sons."
- 45. "No one has LOST more Eviction jury trials than Dennis Block & Associates. DENNISBLOCK.com"
- 46. "Why can't poor Ryan Block meet someone? OK being an eviction attorney at the lowest rated law firm in LA doesn't help... but it's a job!"
  - a. A photo of a man is attached.
- 47. "When I first met my associate Adam Toporoff, I knew I had met the next great mediocre eviction attorney. Just look at that face."

- a. A blurred photo is attached. The word "bumble" appears above the image.
- 48. "When a @fast\_evictions is too fast, come to @Dennisblock for a slow eviction! We take months, even years, and our clients keep paying!"
- 49. "My associate Adam Toporoff beat Basta in a jury trial today. It only took us 4 months and cost client over \$18k...no wonder they hate us."
- 50. "What's it like having a 'happy client'? Is it worth having to call them back? [¶] **Frances Campbell** @tenantsrightsla [¶] JUST received these from happy clients who won at trial yesterday... SO gratifying!"
  - a. A blurry photo is attached.
- 51. "Apparently enrollment at @whittier\_law dropped so much when it got out that Hasti and I went there @WhittierCollege decided to close it."
- 52. "I don't really want to be an eviction attorney, haven't been in a court room in years, and wasn't that good then, I just want to be famous."
- 53. "Fun Fact: We have more attorneys with disciplinary records and ethics violations than ANY other eviction firm in Los Angeles!"
- 54. "It's not just our client info we expose on the open internet, we post our own stuff too because we're incompetent. evict123cases.com/greeting.pdf."
- 55. "You think that's bad you should read our motions! [¶] Frances Campbell @tenantsrightsla [¶] Replying to @tenantsrightsla. [¶] Ugh. when you find a typo in your tweet the next day. :("
- 56. "When you think about it, we have probably lost more jury trials than any other firm in California, so at least we are 'best' at something?"
- 57. "Watch the grammar in my tweets. We put the same lack of attention into everything we do at Dennis Block & Assoc. twitter.com/dennisblock/st... [¶] This Tweet is unavailable."
- 58. "People are surprised that we are still in business especially after reading all the complaints about us. Our secret? Cheap attorneys."

- 59. "Does anyone know a good coke dealer? @evictionca won't share."
- 60. "I must have been so stoned when I wrote this. It doesn't make sense no matter how you look at it. twitter.com/DennisBlock/st...[¶] This Tweet is unavailable."
- 61. "Very. Look at my eyes can't you tell? [¶] VRG @vrguzman [¶] Replying to @DennisPBlock [¶] Why are you including me in this? Who are you even? wtf is your problem? Are YOU high?"
- 62. "I'm a lot like my hero Donald Trump, I have a wife who hates me, two disappointing sons, and a daughter I'd like to date."
- 63. "I have received several calls about my photos on gay social media site Grindr. All I ask is for you to be discrete if my wife Ida answers."
- 64. "It's my birthday next Saturday. You still have time to send me something that shows what you think of me. [¶]

  [Expletives] By Mail- Anonymously mail a bag of

  [expletives] [¶] Anonymously mail a bag of [expletive] [¶]

  [expletive] by mail.com"
- 65. "Very Stable Genius Not Dennis P. Block Retweeted [¶]

  Housing Long Beach @HousingLB 12 May 2017 [¶]

  Before and After. Don't Be Next. Be at the Renter's

  Assembly. bit.ly/2oT9iF [¶] #LBRA2017

  #RentersUnitedLB #StopDisplacementNow"
  - a. A photo is enclosed. The photo appears to be a flyer and reads: "RENTER'S ASSEMBLY #LBRA2017RentersUnitedLB 5/18 AT 6PM." The photo is captioned "BHC Long Beach California Endowment, Tenants Together and 5 others."
- 66. "U.K landlords getting sex for rent? I thought of this years ago.... [¶] Landlord adverts 'target young for sex' [¶] Campaigners warn vulnerable people are being offered rent-free accommodation in the deal. [¶] bbc.com"
- 67. "It's so weird when Tinder matches you to one of your employees... but OK Hasti your move."

- 68. "I can't get any real press but I paid @jazz30633315 to 'interview' me...mostly for her amazing 'happy ending' fb.me/8L5zY8G5A"
- 69. "Bagels for the staff today while I surf porn in my office (three screens!) and they all look for better jobs."
- 70. "Check out my beautiful daughter Madison Block @msblock88. Like Trump says, 'if she wasn't my daughter I'd be dating her'!"
  - a. A blurred phot of a woman is attached.
- 71. "My son Ryan 'the collections expert' has three cases this Friday (all by himself). Hasti finds his success erotic, and frankly I do too."
- 72. "Meet our staff! Manya Thomasian (she's the one Ida SHOULD worry about right @sasoonvp?)"
  - a. A blurred photo is attached.
- 73. "Our Dennis Block & Associates attorney of the day is 'Nasty' Hasti Rahsepar! Check out her reviews on our Yelp!"
  - a. A blurred photo is attached.
- 74. "To all the clients, judges, and opposing counsel who are always complaining about Hasti... yes we KNOW she's too old to dress like that, but what can we do []?"
- 75. "My associate 'Nasty Hasti' Rahsepar continues to sexually harass our entire office with her age inappropriate outfits. That's what I get for recruiting at Hooters."
- 76. "My associate Nasty Hasti really needs to start wearing longer skirts to court. Or underwear. Or at least trim."
- 77. "And whatever you do, don't leave me a bad review on Google or Yelp! Our reputation is almost as bad as Hasti on Tinder!"
- 78. "I still kid 'Nasty' Hasti about going with the C Class... if you're going to get a Benz then get a Benz you know?"
- 79. "Lots of emails today about 'Nasty' Hasti Rahsepar and a particularly unattractive lime green jacket. I just tell people she's color blind."
- 80. "Did you know we have a 'Virtual Hasti' on extension 298? Evict123.cases.com/extension.pdf."

- 81. "Did you hear Hasti won a jury trial today? Apparently the jury was stunned that a woman her age dresses like a teenager in court."
- 82. "A client called to complain that our Manisha Bajaj was 'dressing like a prostitute' I told him wait until he sees 'Nasti Hasti Rahsepar!"
- 83. "I can't confirm that my son Ryan is dating 'Nasti Hasti' Rahsepar, though I do enjoy watching the cameras when they 'work' late."
- 84. "My associate Minesha is dressed like a candy cane today, which may give my associate Paul Gold a seizure."
- 85. "Attorney Paul Gold is getting excited about the annual Yulin Festival .... he calls it 'the worlds best buffet'. [¶]

  Lisa Vanderpump Will Do Everything In Her Power to Stop the Yulin F ... [¶] As any fan of The Real Housewives of Beverly Hills knows, Lisa Vanderpump and Kenn Todd are Staunch, vocal critics of the Yulin Dog Meat ... [¶] bravotv.com."
- 86. "Coming up- the 12th Anniversary of Attorney Paul Gold joining the firm! We're going to sacrifice a puppy at his party."
- 87. "Having trouble recruiting new lawyers. They read Yelp, so they know I'm a screamer, and they've seen our office manager Amy in daylight."
- 88. "I know what you mean Donald, it's like every day with our office manager Amy Riesen but what can we do? [¶] **Donald J. Trump** @realDonaldTrump [¶] ... to Mar-a-Lago 3 nights in a row around New Year's Eve, and insisted on joining me. She was bleeding badly from a face-lift. I said no!"
- 89. "I often wonder where people like Amy Riesen would work if it wasn't for @dennisblock. Not a day goes by I don't get a complaint about her."
- 90. "Why are KTS clients so much happier than at Dennis Block? My yelling? Amy? Bad lawyers?" [¶] Ollmpla G.'s review of Kimball Tirey & St John LLP [¶] Extremely reliable, honest, trustworthy! James Stenberg always keeps us up to date on contract law! And Wendy St. John,

- knowledgeable, has a keen sense of who sh [sic] ...  $[\P]$  yelp.com"
- 91. "Everyone tells me our office manager Amy Riesen is rude. She's had a bit too much work done, but she's always classy. Well, almost always. [¶] Amy @amyriesen1 [¶] "Eat [expletive] and die [expletive]. twitter.com/dennispblock/s…"
- 92. "Planning an intervention for Dennis Block & Associates office manager Amy Riesen with @DrJSurgery."